

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

JUDICIAL WATCH, INC.,  
and TRUE THE VOTE,

*Plaintiffs,*

v.

J. BRADLEY KING, *et al.*

*Defendants.*

Case No. 1:12-cv-800-WTL-TAB

**PLAINTIFFS NOTICE OF AUTOMATIC INITIAL EXTENSION OF TIME TO  
RESPOND TO DEFENDANTS' SECOND SET OF DISCOVERY REQUESTS**

Plaintiffs Judicial Watch, Inc. and True the Vote, by counsel and pursuant to Local Rule 6-1(b) of the U.S. District Court for the Southern District of Indiana, hereby notify the Court and the parties that the time for Plaintiffs to respond to Defendants' Second Set of Discovery Requests is extended 28 days to January 8, 2014 via Automatic Initial Extension. In support of the foregoing, the following is respectfully shown:

1. Defendants served their Second Set of Discovery Requests (Interrogatories and Requests for Production), collectively the "Requests," on Plaintiffs via U.S. mail on November 8, 2013. Undersigned counsel's first receipt of the Requests, in either paper or electronic form, was ten days later, on November 18, 2013 via U.S. mail.
2. The time for Plaintiffs to respond in writing to Defendants' Requests pursuant to Fed. R. Civ. Pro. Rules 6(d), 33(b)(2), and 34(b)(2)(A) is December 11, 2013.
3. Undersigned counsel contacted Defendants' counsel Jefferson Garn on December 3, 2013 concerning this 28 day extension, at which time Mr. Garn stated that he had no objection to the extension.

4. Plaintiffs plan to complete their written responses to Defendants' Requests no later than January 8, 2014 and will endeavor to undertake efforts to do so. However, Defendants' Requests consist of multiple demands for written information and documents directed at each Plaintiff, which the Plaintiffs will need considerable time to evaluate. In light of this, and in light of the U.S. mail delay described above in paragraph 1, and also in light of the intervening federal holidays in November and December and the concurring vacation and travel schedules of Plaintiffs' counsel, there is a chance that Plaintiffs might need to request a further extension of time to complete their written responses to the Requests. Plaintiffs have notified Defendants that they may need this additional time to respond, and have informed them that Plaintiffs will request Defendants' consent to that extension if and when it is needed prior to moving this Court.

Wherefore, Pursuant to Local Rule 6-1(b), upon the filing of this Notice, Plaintiffs' time to respond in writing to Defendants' Requests is now extended to January 8, 2014 via Automatic Initial Extension.

Dated: December 3, 2013

Respectfully submitted,

<p>J. Christian Adams Admitted <i>Pro Hac Vice</i></p> <p>ELECTION LAW CENTER, PLLC 300 N. Washington Street, Ste. 405 Alexandria, VA 22314 Tel: (703) 963-8611 Email: adams@electionlawcenter.com</p> <p>David R. Langdon Joshua B. Bolinger</p> <p>LANGDON LAW LLC 8913 Cincinnati-Dayton Rd. West Chester, Ohio 45069 Tel: (513) 577-7380 Fax: (513) 577-7383 Email: dlangdon@langdonlaw.com jbolinger@langdonlaw.com</p>	<p><u>/s/ Chris Fedeli</u> Paul J. Orfanedes Chris Fedeli Admitted <i>Pro Hac Vice</i></p> <p>JUDICIAL WATCH, INC. 425 Third Street S.W., Ste. 800 Washington, DC 20024 Tel: (202) 646-5172 Fax: (202) 646-5199 Email: porfanedes@judicialwatch.org cfedeli@judicialwatch.org</p>
--	---

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of December, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Chris Fedeli

Chris Fedeli